

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY  
(APWU/USPS-9)**

The United States Postal Service hereby files its institutional response to the above-identified interrogatory of the American Postal Workers Union, dated February 13, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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## **INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

**APWU/USPS-9** The August 2011 list of FSS installations shows that there appear to be several sites that are on the September study list that also have FSS equipment.

- a) Please confirm that the following locations contain FSS equipment and are on the September 2011 list of sites being studied for consolidation: South Florida (5 FSS machines), NW Boston (2 FSS machines), Orlando (2 FSS machines), Fox Valley (2 FSS machines), Herb Peck Annex (2 FSS machines), Middlesex Essex (3 FSS machines), Brooklyn (1 FSS machine), Dallas (1 FSS machine) and Stamford CT (1 FSS machine). If this list is not correct please provide the correct list.
- b) If consolidation of these sites is approved, will the FSS equipment be moved or will FSS processing continue at the current location?
- c) If FSS processing will continue at the current location, please confirm that will require continued use of the building including maintenance and utility costs, and continued transportation to and from the building.

### **RESPONSE**

- a) Not confirmed. There are potential relocations of FSS based on the proposed network laid out within the case. Based on the hypothetical network presented as part of this proceeding, there would be 10 FSS machines moved: Fox Valley (2), Herb Peck Annex (2), Dallas (1), Van Nuys FSS Annex (3), Moreno Valley (1) and Stamford CT (1). However, the degree to which these or any machines will actually move depends upon (a) the outcome of the each of the AMP studies, (b) the amendments to 39 C.F.R. Part 121 that result from the market dominant product service standard rulemaking, and (c) any further modifications that result from consideration of the advisory opinion issued at the conclusion of this docket. Accordingly, this count is only illustrative and is provided solely for the purpose of indicating the nature and magnitude of the changes that could potentially result from the network consolidation plan under review, and should not be interpreted as reflecting that any facility-specific decision associated with the Request have been made or implemented.

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**RESPONSE to APWU/USPS-9 (continued)**

b) If a site is consolidated, its equipment is moved.

c) N/A